

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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PLANS ADMINISTRATION COMMITTEE : Case No. 07-CV-3719  
OF CITIGROUP, INC., IN ITS CAPACITY :  
AS PLAN ADMINISTRATOR OF THE :  
CITIGROUP HEALTH BENEFITS PLAN, :  
: Rule 7.1 Statement  
Plaintiff, :  
: vs. :  
PIERS REDDY, STACY REDDY AND :  
SULLIVAN, PAPAIN, BLOCK, MCGRATH :  
& CANNAVO, P.C. :  
: Defendants. :  
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Pursuant to Federal Rule of Civil Procedure 7.1, the undersigned counsel certifies that the plaintiff is not a non-governmental corporate party, but rather, a fiduciary of an ERISA employee welfare benefit plan, and consequently Rule 7.1 does not apply. Regardless, there are no corporate parents, affiliates and/or subsidiaries of the plaintiff.

DATE: May 8, 2007

/s/ Thomas M. Kelly  
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